

x:\ATS52442\adoption

ROGER P. McTIERNAN, JR (RPM 1680)
BARRY, McTIERNAN & MOORE
2 Rector Street – 14th Floor
New York, New York 10006
(212) 313-3600

Attorneys for Defendant ANN TAYLOR STORES CORPORATION

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X

IN RE LOWER MANHATTAN DISASTER SITE
LITIGATION

-----X

RAMON ZAMBRANA,

**NOTICE OF
ADOPTION**

Plaintiff,

08 CIV 2320

-against-

ON-SITE:

7 WORLD TRADE COMPANY, L.P., A RUSSO
WRECKING, INC., ABM INDUSTRIES, INC., ABM
JANITORIAL NORTHEAST, INC., AMEC
CONSTRUCTION MANAGEMENT, INC., ET AL

OFF-SITE:

100 CHURCH, LLC, ALAN KASMAN DBA KASCO,
AMBIENT GROUP, INC., AMERICAN EXPRESS BANK,
LTD., AMERICAN EXPRESS COMPANY, AMERICAN
EXPRESS TRAVEL RELATED SERVICES COMPANY,
INC., ANN TAYLOR STORES CORPORATION, ET AL,

Defendants.

-----X

PLEASE TAKE NOTICE that defendant, ANN TAYLOR STORES CORPORATION as
and for its responses to the allegations set forth in the Complaint by Adoption (Check-Off
Complaint) related to the Master Complaint filed in the above-referenced action, hereby adopts
ANN TAYLOR STORES CORPORATION's Answer to the Master Complaint dated August 8,
2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site
Litigation*, 21 MC 102 (AKH).

To the extent that ANN TAYLOR STORES CORPORATION's Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above-captioned matter, ANN TAYLOR STORES CORPORATION denies knowledge or information sufficient to form a belief as to the truth of such specific allegations.

WHEREFORE, ANN TAYLOR STORES CORPORATION demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York
May 16, 2008



ROGER P. McTIERNAN, JR. (RPM 1680)
BARRY, McTIERNAN & MOORE
Attorneys for Defendant
ANN TAYLOR STORES CORPORATION
2 Rector Street – 14th Floor
New York, New York 10006
(212) 313-3600

To:

WORBY GRONER EDELMAN & NAPOLI BERN, LLP
Attorneys for Plaintiffs
115 Broadway, 12th Floor
New York, New York 10006
(212) 267-3700